REMARKS

Claims 1-43 are pending. By this Amendment, claims 1, 2, 5, 11, 18, 23, 28-30, 32, 33, 35, 36, 38, and 39 are amended.

Claims 1, 2, 5, 11, 18, 23, 28-30, 32, 33, 35, 36, 38, and 39 are amended to more particularly point out Applicants' claimed invention. No new matter is introduced by the amendments of the claims.

All pending claims stand rejected. Applicants respectfully request reconsideration of the rejections based on the following comments.

Rejection Over Gokcebay and Kurozu Under 35 U.S.C. § 103

The Examiner rejected claims 1, 3-5, 9, 10, 15-17, 35, 37-39, and 43 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,552,650 to Gokcebay et al. ("Gokcebay") in view of U.S. Patent No. 5,117,664 to Kurozu et al. ("Kurozu"). To advance prosecution, Applicants have amended independent claims 1 and 35 to more particularly point out their claimed invention. For the reasons discussed below, the references do not render Applicants' claimed invention prima facie obvious. Accordingly, Applicants respectfully request reconsideration of the section 103(a) rejection in view of the following comments.

"To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure." MPEP § 2142 (citing In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)).

The references do not render Applicants' claimed invention prima facie obvious, as the cited references do not teach or suggest all of the features included in independent claims 1 and 35. Prima facie obviousness is not established if all the elements of the rejected claim are not disclosed or suggested in the cited art. In re Ochiai, 37 USPQ 1127, 1131 (Fed. Cir. 1995); see also, MPEP § 2143.03 ("To establish prima facie obviousness of a claimed invention, all of the claim limitations must be taught or suggested by the prior art.").

Specifically, with respect to claim 1, neither Gokcebay nor Kurozu teach or suggest a security lock having a plurality of sensors capable of optically sensing surface changes of the rotatable discs during rotation of the at least one of the discs to generate a signal used to define a change of state count corresponding with the surface changes. Rather, Gokcebay merely discloses a mechanical lock having disc tumblers. Kurozu merely discloses a sensor usable to sense the position of a key (first and second positions) and does not teach or suggest a sensor capable of optically sensing surface changes of rotatable discs during rotation. Likewise, with respect to claim 35, neither Gokcebay nor Kurozu teach or suggest a security lock having means for optically sensing surface changes of the rotatable discs during rotation of the at least one rotatable disc and using the optically sensed surface changes to generate a change of state signal.

As such, because Gokcebay and Kurozu, individually or in combination, do not teach or suggest all of the features included in claims 1 and 35, the references do not render Applicants' claimed invention prima facie obvious. In view of the discussion above, Applicants do not comment further here on the suitability of combining the references.

With respect to specific features noted by the Examiner in the claims depending from claims 1 and 35, these issues are not commented on further here because they are presently moot given the above analysis, although Applicants do not acquiesce in the Examiner's position. See MPEP § 2143.03 ("If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious.") As such, Applicants respectfully request withdrawal of

the rejection of claims 1, 3-5, 9, 10, 15-17, 35, 37-39, and 43 as being unpatentable over Gokcebay in view of Kurozu.

Rejection Over Gokcebay, Kurozu and Chaum Under 35 U.S.C. § 103

Claims 2, 6, 11, 12, 18, 21-23, 25-31, 33, 34, 36, and 40 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Gokcebay in combination with Kurozu and further in view of U.S. Patent No. 6,318,137 to Chaum ("Chaum"). To advance prosecution, Applicants have amended claims 1, 18, 28, and 35 to more particularly point out their claimed invention. For the reasons discussed below, the references do not render Applicants' claimed invention prima facie obvious. Accordingly, Applicants respectfully request reconsideration of the section 103(a) rejection in view of the following comments.

With respect to the claims depending from claims 1 and 35 (claims 2, 6, 11, 12, 36, and 40), Chaum does not make up for the deficiencies of Gokcebay and Kurozu discussed above. Specifically, while Chaum discloses sensors for sensing bitting patterns on a flat key during insertion or once inserted, like Gokcebay and Kurozu, Chaum does not disclose a plurality of sensors capable of optically sensing surface changes of the rotatable discs during rotation of at least one of the discs to generate a signal used to define a change of state count corresponding with the surface changes. As such, because Gokcebay, Kurozu, and Chaum, individually or in combination, do not teach or suggest all of the features included in independent claims 1 and 35, the references do not render dependent claims 2, 6, 11, 12, 36, and 40 prima facie obvious. In view of the discussion above, Applicants do not comment further here on the suitability of combining the references.

With respect to claim 18, Gokcebay, Kurozu, and Chaum, individually or in combination, do not teach or suggest a security lock having at least one sensor capable of optically sensing the reflective surface changes of the at least one displaceable disc during rotation of the at least one

displaceable disc to generate a reflective surface change of state count. Nor do Gokcebay, Kurozu, and Chaum, individually or in combination, teach or suggest a method of performing a transaction utilizing an optic security lock comprising the step of optically sensing changes of state of the at least one disc during rotational displacement and communicating a signal from the sensor corresponding with the changes of state to a processing system, as recited in claim 28. In view of the discussion above, Applicants do not comment further here on the suitability of combining the references.

With respect to specific features noted by the Examiner in the claims depending from claims 18 and 28, these issues are not commented on further here because they are presently moot given the above analysis, although Applicants do not acquiesce in the Examiner's position. As such, Applicants respectfully request withdrawal of the rejection of claims 2, 6, 11, 12, 18, 21-23, 25-31, 33, 34, 36, and 40 as being unpatentable over Gokcebay in view of Kurozu and Chaum.

Rejection Over Gokcebay, Kurozu and Altschul Under 35 U.S.C. § 103

Claims 8 and 42 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Gokcebay in combination with Kurozu and in further view of U.S. Patent No. 6,144,847 to Altschul et al. ("Altschul"). Applicants respectfully request reconsideration of the section 103(a) rejection in view of the following comments.

Claims 8 and 42 depend from claims 1 and 35, respectively. Altschul does not make up for the deficiencies of Gokcebay or Kurozu discussed above. Specifically, Altschul is directed towards a wireless telephone with credited airtime and does not disclose security lock components. As such, because Gokcebay, Kurozu, and Altschul, individually or in combination, do not teach or suggest all of the features included in independent claims 1 and 35, the references

do not render dependent claims 8 and 42 prima facie obvious. In view of the discussion above, Applicants do not comment further here on the suitability of combining the references.

Applicants respectfully request withdrawal of the rejection of claims 8 and 42 as being unpatentable over Gokcebay, Kurozu, and Altschul.

Rejection Over Gokcebay, Kurozu, and Denison Under 35 U.S.C. § 103

Claim 14 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Gokcebay in combination with Kurozu and in further view of U.S. Patent No. 6,359,547 to Denison et al. ("Denison"). Applicants respectfully request reconsideration of the section 103(a) rejection in view of the following comments.

Claims 14 depend from claim 1. Like Altschul, Denison does not make up for the deficiencies of Gokcebay or Kurozu discussed above. Specifically, Denison is directed towards an electronic access control device and does not teach or suggest a plurality of sensors capable of optically sensing surface changes of the rotatable discs during rotation of the at least one of the discs to generate a signal used to define a change of state count corresponding with the surface changes. As such, because Gokcebay, Kurozu, and Denison, individually or in combination, do not teach or suggest all of the features included in independent claim 1, the references do not render dependent claim 14 prima facie obvious. In view of the discussion above, Applicants do not comment further here on the suitability of combining the references.

Applicants respectfully request withdrawal of the rejection of claim 14 as being unpatentable over Gokcebay, Kurozu, and Denison.

Rejection Over Gokcebay, Kurozu, Chaum, and Altschul Under 35 U.S.C. § 103

Claims 7, 13, 19, 20, and 41 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Gokcebay in combination with Kurozu and Chaum and in further view of Altschul.

Applicants respectfully request reconsideration of the section 103(a) rejection in view of the following comments.

Claims 7 and 13 depend from claim 1, claims 19 and 20 depend from claim 18, and claim 41 depends from claim 35. As discussed previously, Chaum does not make up for the deficiencies of Gokcebay or Kurozu with respect to claims 1, 18, and 35. For the reasons discussed above, Altschul also fails to make up for the deficiencies of Gokcebay or Kurozu. As such, because Gokcebay, Kurozu, Chaum, and Altschul, individually or in combination, do not teach or suggest all of the features included in independent claims 1, 18, and 35, the references do not render dependent claims 7, 13, 19, 20, and 41 prima facie obvious. In view of this discussion, Applicants do not comment further on the suitability of combining the references.

Applicants respectfully request withdrawal of the rejection of claims 7, 13, 19, 20, and 41 as being unpatentable over Gokcebay, Kurozu, Chaum, and Altschul.

Rejection Over Gokcebay, Kurozu, Chaum, and Denison Under 35 U.S.C. § 103

Claims 24 and 32 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Gokcebay in combination with Kurozu, Chaum, and Denison. Applicants respectfully request reconsideration of the section 103(a) rejection in view of the following comments.

Claims 24 and 32 depend from claims 18 and 28, respectively. As discussed previously, Chaum does not make up for the deficiencies of Gokcebay or Kurozu with respect to claims 18 and 28. For the reasons discussed above, Denison also fails to make up for the deficiencies of Gokcebay or Kurozu. As such, because Gokcebay, Kurozu, and Chaum, and Denison, individually or in combination, do not teach or suggest all of the features included in independent claims 18 and 28, the references therefore do not render dependent claims 24 and 32 prima facie obvious. In view of the discussion above, Applicants do not comment further here on the suitability of combining the references.

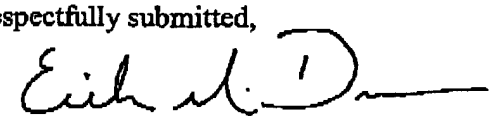
Applicants respectfully request withdrawal of the rejection of claims 24 and 42 as being unpatentable over Gokcebay, Kurozu, Chaum, and Denison.

CONCLUSION

In view of the foregoing, it is submitted that this application is in condition for allowance. Favorable consideration and prompt allowance of the application are respectfully requested.

The Examiner is invited to telephone the undersigned if the Examiner believes it would be useful to advance prosecution.

Respectfully submitted,



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